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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA

Case No. 6:24-mj-00039-MK

v.

**UNITED STATES' UNOPPOSED
MOTION FOR A PROTECTIVE
ORDER**

ADAM BRAUN,

Defendant.

The United States hereby moves for an order pursuant to Rule 16(d)(1), Fed. R. Crim. P., to prevent the dissemination or misuse of discovery material containing sensitive investigation material and personal identifying information. Defense counsel does not object to the proposed protective order.

Defendant has been charged by complaint Defacing and Attempting to Deface or Destroy Religious Real Property because of the racial or ethnic characteristics with people associated with that property. Discovery in this case includes reports, photographs, and other papers and records, which may contain sensitive investigation material and personal identifying information.

By this motion, the government seeks a protective order to shield these sensitive documents from disclosure in the public record and to uninvolved third parties.

In light of the nature of the underlying offense, and the sensitive witness statement information included in the discovery material, the government respectfully requests that the Court authorize a protective order governing discovery provided by the government. The government has no objection to counsel of record, investigators, assistants, and employees reviewing with defendant all discovery material produced by the government. In addition, defendant may review unredacted discovery at in the presence of defense counsel, however, the government requests an order precluding counsel of record, his investigators, assistants, and employees from providing defendant with copies of any unredacted discovery material produced by the government which contains:

- a. personal identifying information of any individual, including without limitation, any individual's date of birth, social security number, address, telephone number, email address, driver's license number, or family members' names ("Personal Information"); or

unless the Personal Information has first been entirely redacted from the discovery materials.

The government and the defense will work together to ensure that these materials are protected and that defendant has unfettered access to as much material as can be provided consistent with this Court's order. For example, this protective order would not preclude defendant from receiving copies of his own criminal history or personal records.

The government further requests that the Court order that neither defense counsel nor defendant shall provide any discovery material produced by the government to any third parties

(i.e., persons who are not a party to this case), or make any public disclosure of the same, without the government's express written permission, except that defense counsel may provide discovery material to those persons employed by defense counsel who are necessary to assist counsel of record in preparation for trial or other proceedings.

Dated: March 19, 2024

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

/s/ Gavin W. Bruce
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